

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

ANWAR, *et al.*,

Plaintiffs,

v.

FAIRFIELD GREENWICH LIMITED, *et al.*,

Defendants.

MASTER FILE No. 09-cv-118 (VM)

**GLOBEOP FINANCIAL SERVICES LLC'S STATEMENT REGARDING
PLAINTIFFS' MOTION FOR FINAL APPROVAL OF
THE PROPOSED GLOBEOP SETTLEMENT**

Defendant GlobeOp Financial Services LLC (“GlobeOp”) hereby states that, while it does not agree with all of the characterizations contained in Plaintiffs’ Memorandum of Law in Support of Final Approval of the Proposed GlobeOp Settlement and Plan of Allocation and an Award of Attorneys’ Fees and Reimbursement of Expenses (“Motion for Final Approval”), it nonetheless supports Plaintiffs’ request for (1) final certification of the Settlement Class for settlement purposes only and (2) final approval of the proposed settlement.

In anticipation of Plaintiffs’ Motion for Final Approval, GlobeOp sent notice of the proposed settlement to the appropriate State and Federal officials on September 24, 2013. *See* Decl. of David H. McGill, dated October 11, 2013 (the “McGill Decl.”) ¶ 2 and accompanying exhibit. Under the Class Action Fairness Act of 2005, an order granting final approval of a proposed settlement may not be issued earlier than 90 days after the later of the dates on which the appropriate Federal official and the appropriate State official are served with notice of the settlement. 28 U.S.C. § 1715(d). Accordingly, to the extent that the Court deems it appropriate to issue final approval of the proposed GlobeOp settlement, GlobeOp respectfully requests that the Court specify that the final approval order shall not go into effect until on or after December 26, 2013.

GlobeOp also notes that the settlement has been fully funded in accordance with the procedures set forth in the Stipulation of Settlement dated August 29, 2013. *See* Stipulation of Settlement, August 29, 2013, Docket No. 1184; McGill Decl. ¶ 3.

Accordingly, GlobeOp respectfully requests that (1) the Court finally certify the Settlement Class for settlement purposes only and approve the proposed Settlement; and (2) provide in the final approval order that the order shall not go into effect until on or after December 26, 2013.

Dated: October 11, 2013
New York, New York

KOBRE & KIM LLP

By: /s/ David H. McGill

Jonathan D. Cogan, Esq.
Jonathan.cogan@kobrekim.com
David H. McGill, Esq.
david.mcgill@kobrekim.com
800 Third Avenue
New York, NY 10022
+1 212 488 1200

Attorneys for GlobeOp Financial Services LLC